

**Comments of Imperial Irrigation District
To Notice of Proposed Marketing Criteria**

To: Mr. Darrick Moe
Desert Southwest Regional Manager
Western Area Power Administration
P.O. Box 6457
Phoenix, AZ 85005-6457

Imperial Irrigation District (“IID”) appreciates this opportunity to submit comments to Western Area Power Administration’s (“Western”) notice of proposed marketing criteria for allocating Federal power from the Boulder Canyon Project (“BCP”). IID is the nation’s largest irrigation district, providing both irrigation service and electric retail service to customers across 6,000 square miles of California’s desert southwest in parts of Imperial and Riverside Counties. IID has approximately 145,000 electric retail customers with a peak load of approximately 1000 MWs. IID owns and operates an electric transmission grid in its service territory and owns approximately 480 MWs of natural gas-fired generating capacity in California and Arizona and is a WECC-certified Balancing Authority.

IID generally supports the conformed criteria that Western has proposed for allocating power from the Boulder Canyon Project (“BCP”). Among the entities that the proposed criteria properly give priority to are municipal utilities and irrigation districts. IID agrees that such entities should receive priority in the remarketing of BCP power post-2017.

IID currently does not receive any power from the Boulder Canyon Project. It is one of the only members of the Southern California Public Power Agency (“SCPPA”) that does not receive an allocation of BCP power. IID intends to submit an application when Western issues its call for applications. IID’s Balancing Authority is directly interconnected to Western’s Desert Southwest Region and has the necessary transmission facilities and rights to receive power from the BCP.

IID's service territory includes one of the most economically impoverished regions of the nation. Imperial County's unemployment rate has consistently hovered around 30% for the past several years and nearly one in four residents live at or below the federal poverty level. In addition, IID is the electric service provider to numerous Native American tribes. IID must continually strive to keep its energy costs as low as possible in order to provide an affordable rate to its many low-income customers. An allocation of BCP power will provide IID with an additional low-cost resource and also assist it in meeting the State of California's greenhouse gas policies by displacing carbon-emitting generation resources with federal hydropower.

IID holds the largest entitlement of water on the Lower Colorado River. It receives approximately 3.1 million acre feet of California's entitlement of 4.4 million acre feet. As a result, IID is already one of the largest non-federal California contributors to the Lower Colorado Multi-Species Conservation Plan ("MSCP").

IID appreciates this opportunity to provide these comments and looks forward to submitting its application for BCP power. If you have any questions for IID, please feel free to contact:

Stephen J. Keene
Braun, Blaising, McLaughlin & Smith, P.C.
4386 Kansas Street
San Diego, CA 92104

Phone: (619) 339-0266
Email: Keene@braunlegal.com